

EXHIBIT

A

Second Supplemental Expert Report:

**An Analysis of Racially Polarized Voting Patterns in Nassau County
and
the Prospects for the Election of African American Voters'
Candidate of Choice Winning an Election
in Proposed Legislative District #19**

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- 1) I am Professor of Political Science and Director of the Center on Democratic Performance at the State University of New York at Binghamton. My primary responsibilities at the University are teaching about politics and research methodology at the graduate and undergraduate levels.
- 2) I received my Ph.D. from Florida State University and have been employed as a professor since 1977, first at the University of New Orleans, 1977-85, and since 1986 at Binghamton.
- 3) I teach courses on American and European politics with a particular focus on questions of political representation.
- 4) I have published co-authored articles on analyzing racial voting patterns in the Urban Lawyer (Summer 1985, vol. 17, pp 369-77; Winter 1987, vol. 19, 65-75; Winter 1988, vol. 20, pp175-91).
- 5) I have not testified in federal court in the last five years. My last testimony came in the summer of 2003 for Albany County.
- 6) I have been retained by counsel for the plaintiffs in the case of *Boone et al. v. Nassau County Legislature* to provide my expert opinion. I am being paid \$200 per hour plus expenses for my study and testimony in this case. My compensation is in no manner contingent on the outcome of this case.
- 7) My expert report is divided into five sections.
 - a. The first describes the methodology I used to estimate patterns of racially polarized voting and racially related turnout differences.

- b. Section two presents and interprets the results of my analysis of racially polarized voting patterns and racially related turnout differences in four elections for countywide office held in 2005 and 2009 (i.e., County Executive, County District Attorney, County Comptroller, and County Clerk).
- c. Section three presents and interprets the results of racially polarized voting patterns and racially related turnout differences in elections for four specific county legislative districts: districts 1, 2, 3, and 7. The analysis within these districts investigates voting patterns in the endogenous elections for County Legislator.
- d. Section four focuses on current legislative districts 3 and 7 (cLD3 and cLD7). These two current districts comprise all but a tiny fraction of the minority influence district in proposed legislative district 19 (pLD19). I add to the analysis of legislative district legislator elections (described in the previous paragraph) by analyzing voting patterns within cLD3 and cLD7 for the exogenous elections for countywide offices.¹ The purpose is to provide a more fully informed idea of whether the proposed minority voter influence district offers minority voters an opportunity to elect a candidate of their choice.
- e. Section five offers a projection analysis for a hypothetical County Legislator election if it were held in the County's proposed LD19.

¹ An endogenous election is held for reasons internal to the system of interest, here the legislative district elections. Exogenous elections are allied to the system of interest but are held for reasons beyond the system of particular interest.

1. METHODOLOGY (§§ 8 – 55)

- 8) The analysis of racially polarized voting patterns and of racial voter turnout differences takes four forms in voting rights litigation and in the social sciences more generally. I label them as (a) homogeneous precinct analysis, (b) simple regression analysis, (c) double regression analysis, and (4) ecological inference. The first three forms were used in the case of Thornburg v. Gingles and cited with approval. The fourth method, ecological inference, was developed in the mid-1990s and has been used in academic publications on a variety of topics; it has also been presented in some recent legal proceedings dealing with the analysis of racially polarized voting. The four methods share this common intuition. When electoral units, such as voting precincts, with high versus low concentrations of racial or language minority groups show correspondingly high and low levels of voter support for a candidate, one infers, first, that the difference in vote support is grounded in the differences in the group composition of the electoral unit and, second, that individuals in the groups voted differently.²
- 9) I describe all four methodologies but rely most especially on a combination of the two forms of regression because, to my knowledge, these have been the principal and sometimes the only forms of analysis relied upon by federal courts when asked to address the question of racially polarized voting. The regression methods also appear to me to provide the most plausible and reliable estimates, as will be apparent when the results are presented below. Nevertheless, to be as thorough as possible, I report the results of all four methods.

² I use the racial descriptors of “African American” and “black” interchangeably. I use “white” as a loose descriptor for all groupings other than those described as black or Hispanic.

- 10) All major inferences are the same regardless of which of the four methodologies is used.
- 11) In paragraphs 12 through 55 I use one election as a simple example in order to describe and explain the methodologies. After describing the preliminaries of the election example and data, I begin with a graphic representation that stands as a useful orientation to all four methodologies. Thereafter I describe, in turn, homogeneous precinct analysis, simple regression analysis, double regression analysis, and ecological inference.

Preliminaries (§§ 12 – 16)

- 12) My example focuses on the 2009 County Clerk election involving Carrie Solages (Democrat and Working Families) running against Maureen O'Connell (Republican, Conservative, and Independent). Solages lost the election to O'Connell: Solages vote = 88,901; O'Connell vote = 146,743.
- 13) Solages is African American and O'Connell is white. Elections with candidates of different races are usually the most revealing of racial voting patterns.
- 14) I use citizen voting age populations (CVAP) as the best descriptor of information on the racial composition of voters in a voter tabulation districts (VTDs, essentially elections districts or precincts for the various polling stations in the County). Alternative forms of counting to determine the racial composition of voters in an electoral unit, such as total population or voting age population, tend to over-represent the percentage of voters in a unit that are African American or Hispanic.
- 15) A unit with, say, a total population of 2000 of whom 1000 are African American or Hispanic has a 50 percent combined minority population. However, due to differences

in socio-economic circumstances and citizenship status among the groups, African Americans and Hispanics may constitute only 40 percent of the legally eligible voters. The inferences of most interest in this report are concerned with how people vote, and therefore the best indication of the racial composition of voters in a VTD in Nassau County is the percentage of racial or language minority group composition of eligible voters.

- 16) The data on the 2009 vote counts for candidates and of the estimates of the 2010 CVAP for each of the 1087 VTDs used in the 2009 countywide elections were delivered to me electronically by Professor Andrew Beveridge, a demographic expert retained by plaintiffs' attorneys. Professor Beveridge provided electronic copies of all the vote and demographic data I use throughout this report.³

Graphic Display of Voter Support for Solages (§§ 17 – 18)

- 17) Figure 1, attached in the Appendix to this report, provides a graphic display of the relationship between Solages's votes and the racial composition of the VTDs. The circles and dots in the interior of the graph represent the position of the various VTDs with respect to their percentage vote support for Solages and the black percentage of CVAP. The horizontal axis records the black of percentage of CVAP, and the vertical axis records the percentage vote support for Solages. To display details about Hispanic voters, the graph uses circles for VTDs that are less than 15 percent Hispanic CVAP and filled-in (grey) dots for VTDs that have more than 15 percent Hispanic CVAP.

³ The match among VTDs, blocks, and election districts has been improved since the time all the analyses reported here were conducted. I examined the correspondence between the demographic data used here and the data in the improved data. The correlations of CVAP counts and of African American percentages of CVAP in the VTDs in the two sets are above .99.

18) It is visually clear that the predominantly white VTDs provide lower vote percentages to Solages compared to the VTDs with majority black CVAP. One can also see a tendency for the VTDs that are greater than 30 percent black CVAP and with greater than 15 percent Hispanic CVAP to support Solages at relatively high percentages levels. In VTDs with lesser than 30 percent black CVAP the voting pattern of Hispanics with greater than 15 percent Hispanic CVAP is mixed.

Homogeneous Precinct Analysis (§§ 19 – 27)

- 19) Homogeneous precinct analysis puts its focus exclusively on sets of VTDs with the CVAP make up being all or nearly white, African American, or Hispanic.
- 20) In situations, as in Nassau County, where only a small number of VTDs are exclusively white and no VTDs are exclusively African American or Hispanic the notion of homogeneous is loosened to focus on districts with fewer than, say, 2, 5, or 10 percent African American CVAPs. In this application I use 10 percent as the cutoff point. This covers 736 nearly homogeneous white VTDs, 7 nearly homogeneous African American VTDs, but no (zero, 0) homogeneous Hispanic VTDs.
- 21) The total CVAP in the 736 predominantly white VTDs is 626,859, of whom 597,580 are white (95.3%), 22,913 are African American (3.6%) and 6,366 are Hispanic (1.0%). The total CVAP in the seven predominantly African American VTDs is 4,130, of whom 3,856 (93.4%) are black, 153 are Hispanic (3.7%), and 121 are white (2.9%).
- 22) In the predominantly white VTDs, 168,270 votes were cast in the County Clerk election, and Solages receive 56,050. That is, by this estimate, white voter support for Solages was 33.3 percent. In the seven predominantly African American VTDs, 667

votes were cast, and 538 went to Solages. That is, by this estimate, black voter support for Solages was 80.7 percent.

23) The homogeneous precinct method does not allow for an estimate of Hispanic voting behavior because no VTD is predominantly Hispanic.

24) On the question of racially polarized voting, the homogeneous precinct analysis indicates that the voting pattern for the 2009 County Clerk office is racially polarized. Solages is the candidate of choice of black voters, and O'Connell is the candidate of choice of white voters.

25) This racially polarized pattern is an instance of legally significant racially polarized voting. The voting pattern was racially polarized and, in addition, the African Americans' candidate of choice, Solages, lost. White bloc voting for O'Connell defeated the African Americans' candidate of choice.

26) This homogeneous precinct method provides an estimate of voter turnout rates. In the predominantly white VTDs 168,270 total votes were cast for County Clerk from a CVAP count of 626,859; therefore the estimated turnout rate for whites is 26.8 percent. In the seven predominantly African American VTDs 667 votes were cast from a CVAP of 4,130; therefore the black voter turnout rate is 16.2 percent. Again, it is not possible to estimate the Hispanic patterns of political behavior with respect to turnout because there are no predominantly Hispanic VTDs.

27) By the homogeneous precinct analysis estimations, whites participated at higher rates in the 2009 County Clerk election in comparison to African Americans.

Simple Regression Analysis (§§ 28 – 36)

28) One obvious limitation of the homogeneous precinct method is that it focuses on subsets of the VTDs, omitting from consideration nearly a third of the CVAP. Another limitation is that it is not capable of producing statistical estimates of Hispanic behavior. Simple regression analysis is more comprehensive in that it takes account of all VTDs, and, within data limitations with respect to reasonably wide independent variation of Hispanic CVAPs percentages in the VTDs, can provide estimates of Hispanic voting behavior.

29) Simple regression uses a linear estimation formula to derive the “best fitting line” to all the data points one can see in the graphic presentation in Figure 1. The notion of “best fitting line” is the line that provides the minimum mis-predictions (technically, squared mis-predictions) of the Solages vote percentages.

30) For interpretative convenience the “best fitting line” has been drawn through the data points in Figure 1.⁴ From the linear estimations one can infer that in the hypothetical circumstance where a VTD has zero percent black and zero percent Hispanic CVAP Solages’s estimated vote percentage support is 32.6. This is an inferred estimate of white voter support for Solages. Next, as the percent black CVAP in a VTD increases the graph shows and the line estimates that so, too, does the vote support for Solages. From the simple regression estimate, a 10 percentage point increase in black CVAP is expected to lead to an increase of 6.73 percentage points in support for Solages. A projected movement from zero percent black CVAP, where Solages’s vote support is

⁴ The line shown in the graph is based on a calculation that weights the VTDs equally, regardless of the number of votes cast in the different precincts. The numerical estimations are based on weighting the precincts with respect to votes cast, because to most accurately describe how individuals behaved one wants to give much more weight to a precinct where 1,000 votes were cast than to one where 10 votes were cast.

estimated to be 32.6 percent, to 100 percent black CVAP is estimated to add 67.3 percent support for Solages above the level of support from white voters. In fewer words, the simple regression estimates indicate that Solages received approximately 32.6 percent support from white voters versus 99.9 percent support from black voters (i.e., $32.6 + 67.3 = 99.9$).

- 31) The simple regression estimate of Hispanic support for Solages indicates that it is hardly distinguishable from, and perhaps a little lower than, the support percentage he received from white voters. The estimated Hispanic percentage support for Solages is 31.2 percent. Here, however, caution is required. One can see from Figure 1 that in areas where Hispanics reside among blacks the tendency (at least from visual inspection) is for VTDs with relatively high Hispanic CVAP percentages to appear above the line of estimation. In the more predominantly white areas Hispanic support for Solages is mixed, sometimes lower and sometimes higher than the line of prediction. It is likely to be that an accurate description of Hispanic voting behavior is conditional, depending on whether Hispanic voters are living in and among predominantly black or white population concentration. I investigate this possibility more fully when I turn my attention (below, Section 3, ¶¶ 68 – 74) to the analysis of specific legislative districts. Until then, it is also useful to note that the rather high estimate of black support via simple regression, 99.9 percent, in comparison to the homogeneous analysis among predominantly black VTDs is probably exaggerated due to the generally higher than average support Hispanic voters living in VTDs that are greater than 30 percent black CVAP gave to Solages.

32) The countywide voting pattern for the 2009 County Clerk office is racially polarized.

Solages is the candidate of choice of black voters. O'Connell is the candidate of choice of white voters. This is consistent with the conclusion based on homogeneous precinct analysis.

33) The racially polarized pattern here is an instance of legally significant racially polarized voting. The voting pattern was racially polarized and, in addition, the African Americans' candidate of choice lost. White bloc voting for O'Connell defeated the African Americans' candidate of choice, Solages.

34) Estimated countywide, Hispanics do not show a tendency to coalesce with African American voters.

35) Simple regression analysis can also be used to estimate voter turnout rates by racial and language minority groups. Figure 2 in the appendix shows the relationship between turnout rates (votes cast as a percentage of CVAP in a VTD) and the black percentage of CVAP, with the VTDs with less than and more than 15 percent Hispanic voters once again distinguished by circles ($< 15\%$) and grey dots ($>15\%$).⁵ The results are white turnout = 27.5 percent; black turnout = 17.8 percent; Hispanic turnout = 8.3 percent.

36) Similar to the homogeneous precinct results, white voter turnout holds about a 3-to-2 advantage over black turnout. Now, with simple regression, we also see that Hispanic turnout is the lowest among the three groups. Therefore, in the 2009 Clerk election, whites participated at higher rates in comparison to African Americans and Hispanics

⁵ The graph omits one VTD where the turnout rate is impossibly high.

Double Regression Analysis (§§ 37 – 45)

37) A possible drawback of the simple regression method when it estimates candidate vote support is that it implicitly assumes that voter turnout rates among black CVAP and other CVAP is the same. This is contrary to the evidence on turnout from both the homogeneous precinct analysis and simple regression estimate of turnout rates. The implication of the implicit assumption is that the estimated level of black and Hispanic voter support for, in this case example, Solages is understated. That is because when, for instance, a VTD is represented as 60 percent black CVAP its black percentage of actual voters is likely to be somewhat lower than 60 percent.

38) Double regression provides a means for taking into account turnout differences between the racial groups when estimating the vote support for a candidate. As its name implies, regression methods are applied twice. The first regression estimates the vote for Solages as a percentage of each VTD's CVAP. The results estimate the percent of the CVAP of each racial grouping who voted for Solages—i.e., the percent white CVAP voting for Solages, the black percentage of CVAP voting for Solages, and the Hispanic percentage of CVAP voting for Solages. The second regression estimates the percentage of the CVAP of each racial grouping who voted for someone other than Solages (i.e., here, O'Connell). The results from the second regression indicate the percent of whites voting for O'Connell, the black percentage of CVAP voting for O'Connell, and the Hispanic percentage of CVAP voting for O'Connell. Since voters either voted for Solages or O'Connell, the combination of, say, black percent of CVAP voting for Solages plus blacks percent of CVAP voting for O'Connell is an estimate of the black percent of CVAP turning out to vote. Likewise, the combination of

Hispanics voting for Solages and Hispanics voting for O'Connell is an estimate of the turnout rate of the Hispanic CVAP. And, of course, the combination of whites voting for Solages and whites voting for O'Connell is an estimate of the turnout rate of the white CVAP.

39) The double regression estimates for the 2009 County Executive election are

- a. Black CVAP for Solages = 18.8%
- b. Black CVAP for other than O'Connell = -0.9%
- c. Hispanic CVAP for Solages = 1.9%
- d. Hispanic CVAP for other than O'Connell = 6.8%
- e. White CVAP for Solages = 9.1%
- f. White CVAP for O'Connell = 18.4%

The estimated turnout rate for blacks is 17.9 percent. The estimated turnout rate for the Hispanics is 8.7 percent. The estimated turnout rate for whites is 27.5 percent.

40) As with the simple regression results, the estimated black voter support for Solages is exaggerated. In fact, it comes in at the impossible result that 105.0 percent of black voters voted for him. Clearly this is tempered and corrected by viewing it in relationship to the homogeneous precinct analysis (and what can be seen in Figure 1). With those points of information in mind, it is safest and proper to conclude that voter support for Solages is in the interval between 80 and 100 percent.

41) Hispanic support for Solages again shows no indication of coalescing with African Americans, when considered countywide. Hispanic support for Solages is estimated to be only 22.1 percent.

- 42) White support for Solages is in the vicinity of what is reported from the homogeneous precinct and simple regression analyses—here, by double regression 33.0 percent.
- 43) By the double regression method, therefore, the results show, for a third time, a pattern of racially polarized voting countywide in the election for the 2009 County Clerk office. Solages is the candidate of choice of black voters. O’Connell is the candidate of choice of white voters.
- 44) It follows, as before, that the racially polarized voting pattern in the 2009 Clerk election is an instance of legally significant racially polarized voting. The voting pattern was racially polarized and, in addition, the African Americans’ candidate of choice lost. White bloc voting for O’Connell defeated the African Americans’ candidate of choice, Solages.
- 45) The turnout estimates are nearly the same as estimated via simple regression—i.e., black turnout = 17.9 percent; Hispanic turnout = 8.7 percent; and white turnout is 27.5 percent. Therefore, in the 2009 Clerk election whites participated at higher rates in comparison to African Americans and Hispanics

Ecological Inference (§§ 46 – 55)

- 46) The ecological inference method of analysis (or “EI”, as it has come to be called) was developed in the mid-1990s as a computationally intensive approach to estimating how individuals behave (e.g., turn out to vote and provide a level of support for a candidate) by taking into account the uncertainty associated with regression (e.g., which turnout assumption and estimate to rely on, simple or double regression), regression’s sometimes exaggerated results (greater than 100 percent black voter support for Solages), and the less than full use of precinct information in homogeneous

precinct/district analysis (i.e., not all precincts/districts enter into the homogeneous precinct/district form of analysis).

- 47) The originator of EI is Professor Gary King, Professor of Political Science at Harvard University. He first described the approach in his book entitled A Solution to the Ecological Inference Problem: Reconstructing Individual Behavior from Aggregate Data (Princeton, NJ: Princeton University Press, 1997). King's book spells out the mathematical details of the EI methodology. In paragraphs 48 and 49 I describe the reasoning behind the approach in non-technical terms.
- 48) The EI approach works from the possible bounds of both the jurisdiction-wide information at hand and each precinct under investigation. For instance, we know that a 40 percent turnout rate among white voters is outside the bounds of possibilities because, if that percentage were true, it would imply that more voters cast a ballot in the 2009 County Executive election than there were actual ballots cast. Overall and within precincts there are limits or bounds to the possible numerical descriptions of voter turnout and candidate support. The methodology relies on those limits to arrive at estimates of how individuals from different groups behaved.
- 49) An example of how EI works as it homes in on its best estimate of turnout may help. The process might start by entertaining the thought that 40 percent of white voters turned out to vote. That result turns out to be impossible because it would mean that 310,163 votes were cast ($.4 \times 775,407 = 310,162.8$, where the 775,407 count is the CVAP whites in Nassau). The record shows only 235,374 votes cast in the 2009 County Clerk election. The next step might be to move to a more plausible thought: perhaps 30 percent of the white CVAP cast ballots. This is logically possible in that it

implies white CVAP cast 232,622 votes. Nevertheless, while possible, it is not plausible inasmuch as it implies that African Americans and Hispanics cast just 2,752 votes, which is a mere 1.7 percent of their combined CVAP. The majority-black districts, with turnout rates in the vicinity of 18 (see Figure 2) run contrary to the plausibility of such a low estimate. Thus, the EI procedure would reject the 30 percent white turnout and continue iteratively until the information on the turnout in the County overall and in each precinct is reasonably reconciled.

- 50) Applied to voter turnout in the 2009 County Clerk election, the EI method estimates white turnout of 27.6 percent of CVAP, black turnout as 14.7 percent of black CVAP, and 13.7 percent of Hispanic turnout of Hispanic CVAP.
- 51) In application to the analysis of vote support for Solages, the EI method estimates that 87.9 percent of African American voters supported him. Also, 54.9 percent of Hispanic voters supported him, and 31.2 percent of white voters supported him.
- 52) The EI method, as with the three other methods, reveals a pattern of racially polarized voting countywide in the election for the 2009 County Clerk office. Solages is the candidate of choice of black voters. O'Connell is the candidate of choice of white voters.
- 53) It follows, as before, that the racially polarized voting pattern in the 2009 Clerk election is an instance of legally significant racially polarized voting. The voting pattern was racially polarized and, in addition, the African Americans' candidate of choice lost. White bloc voting for O'Connell defeated the African Americans' candidate of choice, Solages.

- 54) EI stands apart on two matters, however. On the question of group support for Solages EI indicates that Hispanics show a small majority tendency to coalesce with African American voters, and the estimated turnout rate for blacks is slightly lower and for Hispanics slightly higher than the estimates from the two forms of regression.
- 55) Except for the matter of Hispanic voter support for Solages being much above the regression estimates, all differences in the numerical results among the four methods are usually and generally small, point in the same direction, and lead to the same conclusions. The County Clerk election countywide has a pattern of racially polarized voting, the racial polarization is legally significant, and the voter turnout rate of whites is higher than that of African Americans and Hispanics.

2. COUNTYWIDE OFFICE ELECTIONS, 2005 & 2009 (§§ 56 – 67)

- 56) Table 1 in the Appendix to this report, lists the major party candidates, their vote totals, the race of the candidate, and the winner in four countywide office elections and four selected legislative districts based on vote counts summed across the VTDs.
- 57) Of special note, the two majority-minority legislative districts (cLD1 and cLD2, where the lower case “c” indicates the district number refers to the current districts) have nominated minority race candidates in all four elections to the County Legislature. Of course, then, a minority candidate won the election. In the two countywide elections with a minority candidate on the ballot, Ferrell for County Clerk in 2005 and Solages for County Clerk in 2009, the minority candidate lost. Indeed, Ferrell ran between 20,000 and about 45,000 votes behind the three other countywide Democratic candidates in 2005; similarly, Solages ran between 30,000 and nearly 45,000 votes behind the three other countywide Democratic candidates in 2009.

58) Table 2, in the Appendix, reports the results of the four methods of analysis applied to the questions of racially polarized voting patterns and racially related turnout differences in the 2009 countywide elections. All four methods show racially polarized voting patterns in three elections. The racial patterning of the vote is largest in the County Clerk election where a black candidate, Solages, was on the Democratic ballot. About one-third of the white voters are estimated to have supported Solages, who was the black voters' candidate of choice—i.e., black voter support for Solages is estimated to have been between 80 and 100 percent. The County Executive and County Comptroller elections also show racial polarization, with black voters preferring the Democratic candidates, with percentages levels somewhere between 75 and 100, while white voters supported the Republican candidates with between 42 and 47 percent of their votes going to the black voters' candidates of choice. In the County DA election, a slight majority of white voters, around 51 percent, supported the black voters' candidate of choice, Rice.

59) Similar to what was presented when using the 2009 County Clerk election example to explain my methodologies, Hispanic voters appear not to coalesce with black voters but rather side with white voters. The one caveat at this juncture is that the EI form of analysis leads to a different inference on the Hispanic-black versus Hispanic-white coalition question. I will return to this below.

60) Turnout rates also differ by racial and language minority groups. White turnout holds about a three-to-two advantage over black turnout and between a two-to-one and three-to-one advantage over Hispanic turnout.

- 61) White voters were able to elect their candidate of choice in all four 2009 county wide elections. Black voter's candidates of choice lost three of four times. And, while there is a hint of ambiguity about candidates of choice of Hispanic voters, their apparently preferred candidate won all four elections.
- 62) The results of my racial polarization and turnout analyses of the 2005 countywide elections are reported in Table 3 (see Appendix). In this year, black and white voters are not polarized in the County Executive or County Comptroller elections. The County DA elections show borderline racial polarization. The County Clerk election, involving black candidate Ferrell, is racially polarized.
- 63) The results for Hispanics' candidate support in these countywide elections are even more varied by method, and by the double regression method they are clearly wrong. It is safest and proper to conclude that Hispanic voting patterns are not reliably estimated in countywide elections given the nature of residential patterning. Most large concentrations of Hispanics are in areas that also have large African American CVAP percentages; that makes it difficult to parse the candidate support coming from blacks and from Hispanics. In addition, the relatively low turnout percentage estimates for Hispanics make their estimates of candidate support especially sensitive to small variations in each method's estimate of Hispanic turnout.
- 64) As in the 2009 election, the 2005 turnout rates among the three racial and language minority groups show white turnout holds about a three-to-two advantage over black turnout and between a two-to-one and three-to-one advantage over Hispanic turnout.

- 65) In 2005, the black voters' candidate of choice was elected in three of four countywide contests. White voter's candidates of choice were also elected in three of four elections.
- 66) The eight elections across the two years show white voters' candidates of choice elected were elected seven of eight times. One election, County DA in 2005, has black voters making the difference, inasmuch as Rice received about 47 to 49 percent support from white and the 75 to 95 percent support from blacks put her in the winning column.
- 67) Notably, when a black candidate was on a countywide ballot, she or he received the lowest support from whites and ran the poorest in the overall County vote tallies compared to the six other candidates of choice of African American voters.

3. ELECTIONS IN LD1, LD2, LD3, & LD7: 2003 - 2009 (§§ 68 – 74)

- 68) Tables 4 through 7, appended, report on racial voting patterns and turnout rates for elections in cLD1, cLD2, cLD3, and cLD7. Voters in these current districts are the voters who make up nearly all the voters in the County's proposed districts with substantial minority populations (i.e., proposed districts 1, 2, and 19—hereafter pLD1, pLD2, and pLD19).
- 69) The analysis can be summarized succinctly for each of the four.
- 70) After seeing a borderline pattern of racially polarized voting in cLD1 the first time it was used in 2003, no pattern of racially polarized voting appears again through 2009. Generally, the elections in cLD1 show black, Hispanic, and white voters providing majority support to candidate Abrahams. White voter turnout is moderately higher than black turnout; Hispanic turnout is far below that of the other two groups. In brief,

from the mid-decade onward this majority-minority district shows broad, three-way group support for one candidate, Abrahams.

71) Elections in cLD2 sometimes show polarized voting, with black and Hispanic voters forming a coalition in support of either candidates Troiano (2009) or Corbin (2003, 2005, and 2007). White voters did not always agree. In 2009 a racially polarized voting pattern is apparent (from three of the four methods of analysis), and in 2003 the voting is racially polarized. The patterns in both 2005 and 2007 are borderline cases of racial polarization. Whites provide 45 to 55 percent support to the black and Hispanic voters' candidates of choice. Black voter turnout is about the same as in cLD1; however, Hispanic turnout is noticeably higher than cLD1 while white turnout is lower than in cLD1 (and, as is shown below, in cLDs 3 and 7). All in all, cLD2 has elected the black and Hispanic voters' candidates of choice, with cross-group support and with white voters sometimes agreeing and sometimes not.

72) Although the evidence on African American and Hispanic electoral coalition formation is questionable based on data analyzed countywide and is difficult to discern in cLD3 and cLD7 (see below), in the two current majority-minority districts African American and Hispanic voting coalitions exist.

73) The four elections in cLD3 each show strong patterns of racially polarized voting. African American voters have given 75 to 90 percent support to the three different Democratic candidates. White voters supported the African American voters' candidate of choice with just 20 to 33 percent vote support. On the issue of turnout, white rates show a little greater than a three to two advantage compared to black turnout. Here, in cLD3, the residential patterns of Hispanic voters make it non-credible

to say what their candidate preference or turnout levels may have been. Overall, cLD3 is a district with a strong pattern of racially polarized voting, with white voters also holding a turnout advantage. In all four elections, the racial polarization rises to the level of legal significance in the sense that white bloc voting defeated the African American voters' candidate of choice.

74) The final legislative district I investigated for evidence of racial voting patterns is cLD7. On the question of racial polarization, it exists in the recent 2009 election but not in 2003 through 2007. Here, in cLD7, even in the 2009 election where there is racial polarization it does not rise to the level of legal significance inasmuch as the African Americans' candidate of choice won. The one caveat to note is that in all four elections both major party candidates have been white. That leaves for another analysis the prospects of whether an African American candidate (or other minority race candidate) would have the same prospects. Finally, for the same reasons as in cLD3, it is not possible to make a reliably credible statement about Hispanic voting behavior in cLD7.

4. EXOGENOUS ELECTIONS IN LD3, & LD7, 2003 - 2009 (¶¶ 75 – 81)

75) Because I understand the focus in the case at hand to be whether the proposed districting plan has three districts where African American and Hispanic voters have an equal opportunity to elect their candidate of choice, I turned my attention to cLD3 and cLD7.

76) My evidence shows that cLD1 and cLD2 presently do provide African American voters with an equal opportunity. I expect the same would likely be true in pLD1 and pLD2. The question that remained for me was whether the same holds for pLD19.

- 77) From the evidence I have seen, pLD19 is not majority-minority CVAP. Moreover, approximately two-thirds of the population going into pLD19 comes from cLD3 and approximately one-third from cLD7. With the pattern of racially polarized voting in cLD3, one has to wonder whether pLD19 might operate as a district where minority voters have an equal opportunity to elected candidates of their choice, or whether it might be properly described as a minority-influence district where minority voters could influence an election outcome, or whether it might operate to frustrate the minority voters' chances to elect candidates of their choice.
- 78) To address this question I investigated the voting behavior of African Americans and whites for 2005 and 2009 focusing on countywide office election returns coming solely from within cLD3 and cLD7. (The evidence from the LD analysis in section 3, above, shows that reliable statements about Hispanic voting behavior cannot be made; the same is true for the countywide election returns within cLD3 and cLD7.)
- 79) In cLD3 all four countywide elections in both 2009 and 2005 are racially polarized. The largest degree of polarized voting in cLD3 occurs in the two County Clerk elections when African American candidates, Solages and Ferrell, sought that office.
- 80) In cLD7 racial voting patterns for countywide offices, are usually not polarized, in either 2009 or 2005. The one clear exception is the 2009 contest for County Clerk, when Solages, an African American candidate, received less than 40 percent of the white vote and about two-thirds of the black vote.
- 81) From the frequent racial polarization in cLD3 and the racial polarization in cLD7 when an African American candidate was on the ballot, there has to be doubt about whether constructing a new district, with two-thirds of the population coming out of cLD3 and

one-third coming out of cLD7, would be a district that offers minority voters an equal opportunity to elect a candidate of their choice.

5. PROJECTION ANALYSIS, PROPOSED LD19 (§§ 82 – 107)

- 82) In order to project how pLD19 might perform with respect to electing African American voters' candidates of choice, hypothetical electoral competition had to be constructed.
- 83) The commonly accepted standards for making projections for districts when no election has actually been held is to rely on voting patterns in related but necessarily exogenous elections in the jurisdiction under analysis. Once the exogenous elections are selected the method applied is a matter of arithmetic. The analyst takes the exogenous elections' votes cast in the relevant portions that are going into a proposed district and sums them.
- 84) Approximately two-thirds of the CVAP in pLD19 comes from cLD3. Table 12 reports the VTDs, in whole or in part as indicated, that are proposed to be moved into pLD19 along with the estimated CVAPs.
- 85) Because the CVAP contribution from cLD3 predominates in pLD19, I used cLD3 as the base electoral unit for making projections.
- 86) District-wide, the Republican candidate John Ciotti won the 2009 contest over the African American voters' preferred Democratic candidate Nina Petraro Bastardi. The vote split was 6,358 for Ciotti and 4,598 for Bastardi, with Table 4 (discussed above and appended below) showing that Bastardi was the candidate of choice of African American voters.

87) In the part of cLD3 that has been moved into pLD19, the vote split was different.

Assuming vote splits in VTDs where a fraction of voters were moved is proportionate to the vote split in the VTD as a whole {e.g., if a VTD overall vote split was 50 for Ciotti and 40 for Bastardi and three-tenths (.3) of the VTD was moved, I assumed a vote split of 15 for Ciotti (i.e., $.3 \times 50 = 15$) and of 12 for Bastardi (i.e., $.3 \times 40 = 12$)}, Ciotti is estimated to receive 3,117 while Bastardi is estimated to receive 3,362.

88) I conclude that the movement out and retention of voters in cLD3 to comprise pLD19 works in favor of electing African Americans' candidates of choice. That is, the African American voters' candidate of choice, Bastardi, is estimated to lead candidate Ciotti in this part of the proposed construction, whereas under cLD3 as a whole in the actual 2009 election Bastardi lost.

89) The projection also needs to consider voters from cLD7 who have been added to the cLD3 to comprise nearly all of pLD19—noting that for the purpose of this projection I deemed it an unnecessary complication to add the estimated count of 19 CVAP from cLD5. Voters from cLD5 could not add more than 19 votes to the totals and more likely would add 5 or 6. These additions could not make any difference to my conclusions. (See Table 12.)

90) I considered five different scenarios for additions to the vote estimates based on cLD3 taken a baseline (see ¶ 87, above, for that baseline total).

- a. The first scenario adds the votes from the 2009 County Legislative election in cLD7 that come (in whole or part as premised on the proportions reported in Appendix A) from the VTDs that have been moved to pLD19.

- b. Scenarios two through five add the votes from the four 2009 county-wide elections using the VTDs from cLD7 (in whole or part as premised on the proportions in Appendix A). The four elections were for County Executive, District Attorney, County Comptroller, and County Clerk.

- 91) In all five elections I have estimated and reported that the candidate running on the Democratic line was the candidate of choice of African American voters.
- 92) The results of these projections from the five sets of votes, alone from cLD7 and in combination with the votes from cLD3 (as reported in ¶ 87, above), are reported in Table 13.
- 93) Four of the five vote projected totals from cLD7 show the candidates of choice of African American voters leads over her or his hypothetical Republican opponent. The one election where the Democratic candidate, Carrie Solages, runs behind the Republican candidate, Maureen O'Connell, is the election for County Clerk.
- 94) This is important because candidate Solages is the one candidate among the five who is African American. This distinction led me to an extended examination of votes for Solages and O'Connell, as all recent elections in both of the current majority-minority districts, cLD1 and cLD2, have involved a black Democratic candidate.
- 95) I first examined the votes by cLD3 and cLD7 and the VTDs within each. The details of the votes for the two candidates are reported in Table 14. Solages runs ahead of O'Connell in the portions of cLD3 that have been moved to pLD19 but behind O'Connell in the parts of cLD7 that have been moved to pLD19.
- 96) I then examined the Solages's lagging support by VTD in cLD7 to see whether the lag was uniform or varied across VTDs. These vote tallies are shown in Table 15.

- 97) In each and every VTD in cLD7 Solages is estimated to run behind the three other countywide Democratic candidates and behind the Democratic candidate (Jeffrey Toback) in cLD7, with vote differences between Solages and Democratic candidates for the four other offices being largest in VTDs 465, 468, and 469.
- 98) The 2005 countywide election also offered a comparison of white and black Democratic candidates. In that election the County Clerk Democratic candidate was Tricia Ferrell, like Solages in 2009 a black candidate. The three white candidates running for the other countywide offices were the same three that ran in 2009—viz., Suozzi, Rice, and Weitzman.
- 99) To examine whether the pattern that shows Solages lagging behind in vote totals in the parts of cLD7 that are proposed to be moved into pLD19 is peculiar to black Democrats, I compared Ferrell's votes to the three white candidates in the same parts of cLD7 that are being moved. The projected votes are reported in Table 16.
- 100) Similar to Solages in 2009, Ferrell received fewer votes in almost each and every VTD (or portion) compared to the three white Democratic candidates for the three countywide offices. (For completeness in making comparisons Table 17 reports projected vote totals in all VTDs, or their portions, as proposed for pLD19.)
- 101) I conclude that a black Democratic candidate faces an uphill struggle to receive votes in the portions of cLD7 that are proposed to be moved into pLD19, so much so that by the projections based on 2009 data the black candidate is the projected loser in pLD19.
- 102) Because a black Democrat would face such an uphill struggle for votes in pLD19, I conclude African American voters have an opportunity to elect a candidate of their

choice if the candidate is a white Democrat, but I have doubt about whether the African American voters' candidate of choice would win if the candidate is black.

103) This leads me to characterize pLD19 as a possible influence district for minority voters but not as a majority-minority district that provides them with an equal opportunity to elect a candidate of their choice.

104) Could there be an alternative, a districting plan with three majority-minority districts each of which provide African American and Hispanic voters an opportunity to elect candidates of their choice? There may be several such alternatives, but I can offer a simple 'yes' on the basis of a possible district plan drawn by Andrew Beveridge.

105) I have analyzed the prospects of that plan electing African American and Hispanic voters' candidate of choice by projecting election outcomes in the three minority-majority districts based on votes in the 2009 County Clerk election, which is an election which shows racially polarized voting patterns with an African American candidate, Solages, running against a white opponent, O'Connell.

106) The results are shown in Table 18. In all hypothetical districts Solages is the projected winner by substantial margins. There is not much doubt from this hypothetical alternative that a plan with three majority-minority districts could be drawn and perform so that African American and Hispanic voters are able to elect their candidates of choice and, importantly, would be expected to do so regardless of whether the minority-preferred candidate is white or black.

107) Taken together the evidence indicates that, in the face of various indications of racially polarized voting patterns and of black-Hispanic voter coalition behavior in two

current districts where the two groups reside together, a new districting plan in Nassau County creates two majority-minority districts along with a third district that might be called a minority-influence district. The evidence also shows, however, that a new districting plan could be drawn with three minority-majority districts that are each expected to perform as majority-minority districts—i.e., each would hold the prospects of providing minority voters opportunities to elect white, Hispanic, or African candidates of their choice.

/s/ Michael D. McDonald

Michael D. McDonald

Date: June 30, 2011

Figure 1: Plot of the Relationship between Vote Percentage Support for Solages and the Black Percentage of Citizen Voting Age Population

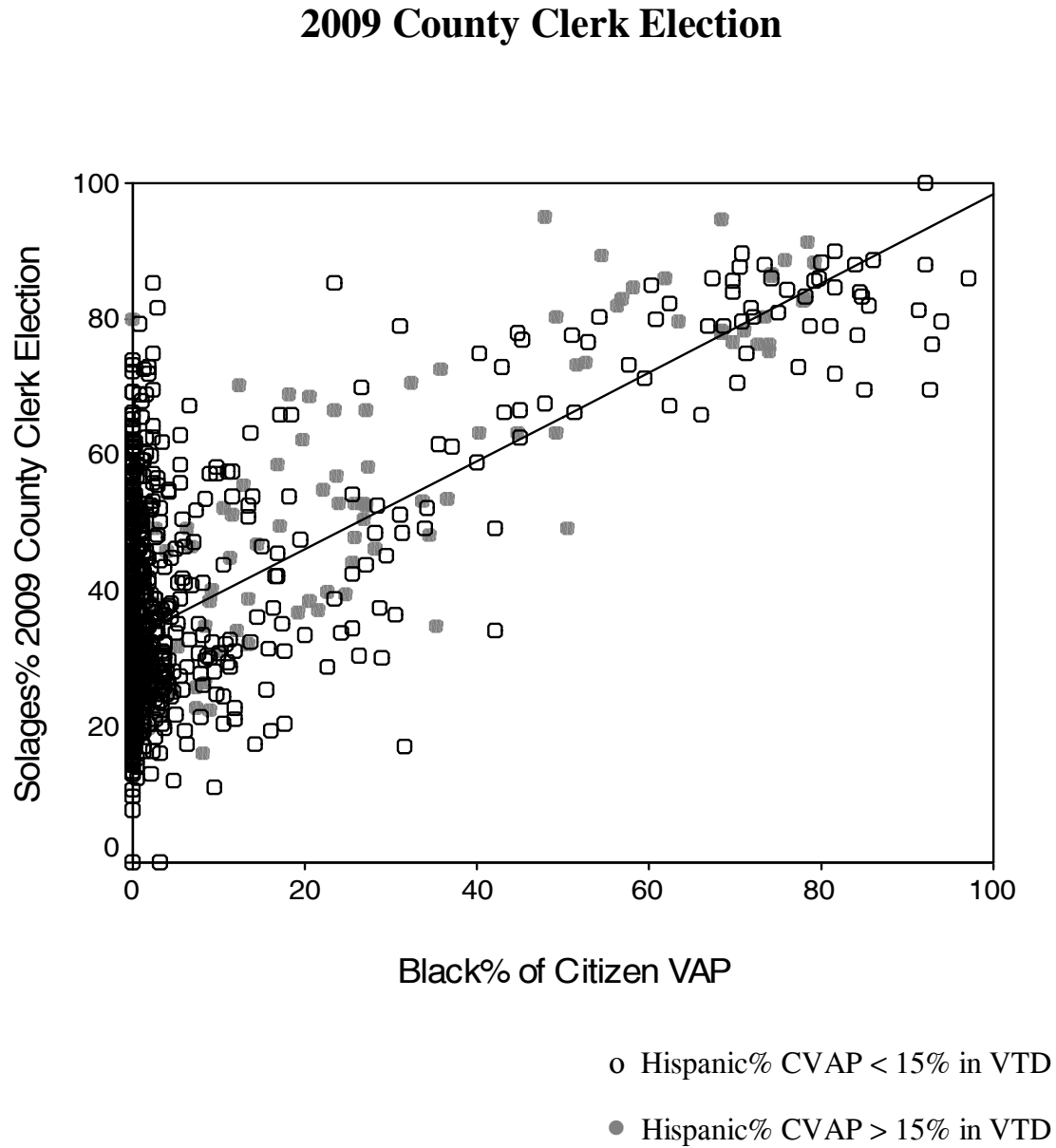
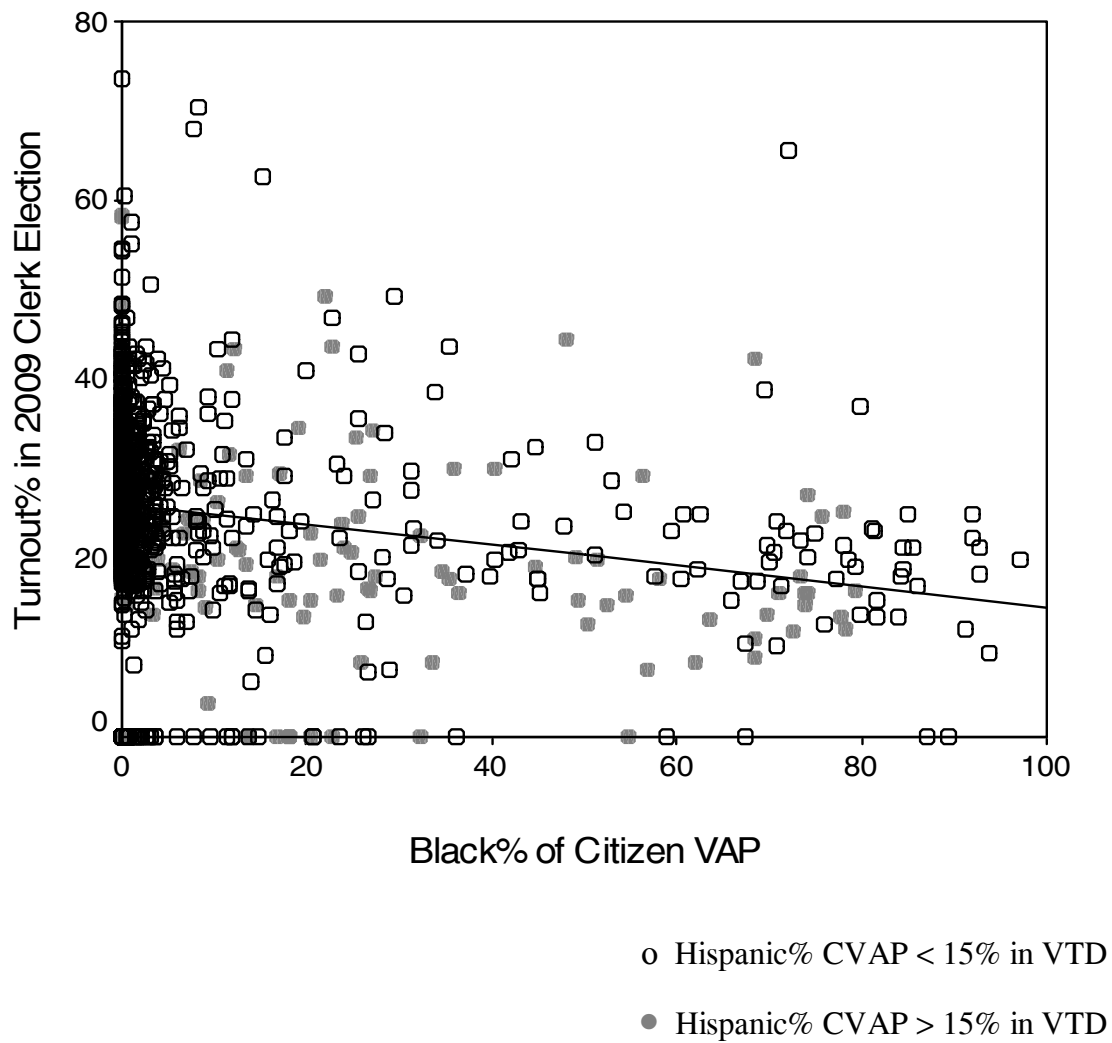


Figure 1: Plot of the Relationship between Voter Turnout Rates and the Black Percentage of Citizen Voting Age Population^a

2009 County Clerk Election



^a Plot excludes one VTD with an impossibly high turnout rate.

Table 1: Major Party Candidates and Their Vote Totals in Nassau Countywide and Select Legislative Districts, 2003 – 2009

Year	Office	Republican Candidate	Republican Candidate Vote	Democratic Candidate	Democratic Candidate Vote	Winner
2009	Executive	Mangano (W)	122,490	Suozzi (W)	122,102	Mangano
2009	DA	Watson (W)	112,382	Rice (W)	132,551	Rice
2009	Comptroller	Maragos (W)	119,266	Weitzman(W)	118,611	Maragos
2009	Clerk	O'Connell (W)	146,473	Solages (B)	88,901	O'Connell
2009	LD#1	McCabe (B)	1,082	Abrahams (B)	6,349	Abrahams
2009	LD#2	Partee (B)	1,649	Troiano (B)	5,285	Troiano
2009	LD#3	Ciotti (W)	6,358	Bastardi W)	4,598	Ciotti
2009	LD#7	Kopel (W)	7,181	Toback (W)	5,683	Kopel
2007	LD#1	Bryant (B)	854	Abrahams (B)	4,649	Abrahams
2007	LD#2	Lopez (H)	1,171	Corbin (B)	3,856	Corbin
2007	LD#3	Ciotti (W)	5,604	Mirza (A)	4,066	Ciotti
2007	LD#7	Kopel (W)	4,327	Toback (W)	5,066	Toback
2005	Executive	Peterson (W)	118,149	Suozzi (W)	181,677	Suozzi
2005	DA	Dillon (W)	145,502	Rice (W)	153,169	Rice
2005	Comptroller	Clavin (W)	135,175	Weitzman (W)	154,915	Weitzman
2005	Clerk	O'Connell (W)	150,357	Ferrell (B)	134,463	O'Connell
2005	LD#1	Edmondston (B)	1,322	Abrahams(B)	8,189	Abrahams
2005	LD#2	Alexander (B)	1,750	Corbin (B)	6,767	Corbin
2005	LD#3	Ciotti (W)	6,704	Mirza (A)	5,880	Ciotti
2005	LD#7	Katz (W)	7,127	Toback (W)	8,657	Toback
2003	LD#1	LaRosa (H)	1,059	Abrahams (B)	5,726	Abrahams
2003	LD#2	Arroyo (H)	1,455	Corbin (B)	5,218	Corbin
2003	LD#3	Ciotti (W)	5,901	DeAngelis (W)	4,527	Ciotti
2003	LD#7	Jacobowitz (W)	4,366	Toback (W)	6,298	Toback

Table 2: Results of Racially Polarized Voting and Turnout Analysis in the 2009 Countywide Elections

Office	Black Voters' Candidate of Choice	Method of Analysis	Black Vote%	Hspn Vote%	White Vote%	Black TO%	Hspn TO%	White TO%	Racially Polarized Voting	Black & Hispanic Coalition
Exec	Suozzi	Homog Precinct	76.8	***	44.7	17.7	***	29.0	Yes	No
		Simple Regr	96.9	33.5	44.6	19.2	9.0	29.7	Yes	No
		Double Regr	101.2	13.7	46.8	19.3	8.9	28.5	Yes	No
		EI	89.2	57.1	42.9	15.9	14.7	29.7	Yes	Yes
DA	Rice	Homog Precinct	79.6	***	51.3	17.1	***	28.0	No	No
		Simple Regr	94.7	45.2	51.1	18.4	8.2	28.7	No	No
		Double Regr	98.1	30.5	51.3	18.5	8.5	28.7	No	No
		EI	90.0	61.5	49.9	15.1	14.2	28.7	Yes	Yes
Comp	Weitzman	Homog Precinct	84.4	***	46.7	15.3	***	27.3	Yes	No
		Simple Regr	101.0	34.8	46.5	17.1	7.5	28.0	Yes	No
		Double Regr	105.8	7.6	46.7	17.2	7.5	28.0	Yes	No
		EI	93.2	57.4	44.8	14.0	13.3	28.0	Yes	Yes
Clerk	Solages	Homog Precinct	80.7	***	33.3	16.2	***	26.8	Yes	No
		Simple Regr	99.7	31.3	32.6	17.8	8.3	27.5	Yes	No
		Double Regr	104.4	22.1	33	17.9	8.7	27.5	Yes	No
		EI	87.9	54.9	31.2	14.7	13.7	27.6	Yes	Yes

*** No estimate is possible.

Table 3: Results of Racially Polarized Voting and Turnout Analysis in the 2005 Countywide Elections

Office	Black Voters' Candidate of Choice	Method of Analysis	Black Vote%	Hspn Vote%	White Vote%	Black TO%	Hspn TO%	White TO%	Racially Polarized Voting	Black & Hispanic Coalition
Exec	Suozzi	Homog Precinct	82.1	***	58.1	25.1	***	34.6	No	***
		Simple Regr	93.4	3..9	58.5	25.0	11.3	35.4	No	No
		Double Regr	99.1	-11.0	59.5	24.5	11.7	34.8	No	No
		EI	84.0	57.3	56.5	21.8	16.7	35.7	No	Yes
DA	Rice	Homog Precinct	76.9	***	49.2	23.2	***	34.0	Yes	***
		Simple Regr	92.0	28.7	49.2	23.3	11.5	34.7	Yes	No
		Double Regr	96.1	-2.2	49.3	23.6	12.3	34.7	Yes	No
		EI	82.5	59.9	47.4	20.4	16.4	35.0	Yes	Yes
Comp	Weitzman	Homog Precinct	78.2	***	51.9	21.7	***	33.0	No	***
		Simple Regr	93.1	20.1	52.4	22.5	10.5	33.8	No	No
		Double Regr	96.4	-30.3	52.4	22.7	11.2	33.8	No	No
		EI	81.0	55.9	50.1	19.8	15.5	34.1	No	
Clerk	Ferrell	Homog Precinct	83.2	***	44.2	22.9	***	32.4	Yes	***
		Simple Regr	97.2	25.2	44.2	23.5	9.8	33.0	Yes	No
		Double Regr	100.8	-12.7	44.3	23.8	10.6	33.1	Yes	No
		EI	85.1	46.4	42.1	20.6	15.4	33.3	Yes	No

*** No estimate is possible.

Table 4: Results of Racially Polarized Voting and Turnout Analysis in Four Legislative Districts: 2009

Dist #	Black Voters' Candidate of Choice	Method of Analysis	Black Vote%	Hspn Vote%	White Vote%	Black TO%	Hspn TO%	White TO%	Racially Polarized Voting	Black & Hispanic Coalition
LD #1	Abrahams	Homog Precinct	88.7	***	***	20.2	***	***	***	***
		Simple Regr	94.7	78.8	55.8	19.2	8.2	28.0	No	Yes
		Double Regr	95.3	68.7	62.5	19.2	8.6	28.0	No	Yes
		EI	94.1	68.1	56.6	19.0	22.9	30.3	No	Yes
LD #2	Troiano	Homog Precinct	65.9	***	29.2	12.4	***	20.3	Yes	***
		Simple Regr	78.8	97.6	47.0	20.0	18.3	12.5	Yes	Yes
		Double Regr	80.3	95.3	45.7	19.0	20.5	12.0	Yes	Yes
		EI	79.1	91.1	52.8	17.4	40.8	24.9	No	Yes
LD #3	Bastardi	Homog Precinct	***	***	26.5	***	***	30.7	Yes	***
		Simple Regr	77.5	45.6	21.8	19.7	***	32.2	Yes	No
		Double Regr	81.8	***	23.7	19.7	***	32.4	Yes	***
		EI	78.7	79.9	17.9	***	0.3	29.3	Yes	Yes
LD #7	Toback	Homog Precinct	***	***	45.1	***	***	26.9	***	***
		Simple Regr	72.5	***	44.0	11.9	***	28.1	Yes	***
		Double Regr	128.8	***	45.2	12.3	***	28.7	Yes	***
		EI	70.9	47.3	45.8	3.5	14.1	19.2	Yes	No

*** No estimate is possible or no reliably plausible estimate produced.

Table 5: Results of Racially Polarized Voting and Turnout Analysis in Four Legislative Districts: 2007

Dist #	Black Voters' Candidate of Choice	Method of Analysis	Black Vote%	Hspn Vote%	White Vote%	Black TO%	Hspn TO%	White TO%	Racially Polarized Voting	Black & Hispanic Coalition
LD #1	Abrahams	Homog Precinct	81.2	***	***	16.3	***	***	***	***
		Simple Regr	87.9	97.0	61.5	15.0	5.5	18.2	No	Yes
		Double Regr	88.6	110.0	64.9	15.0	5.5	18.2	No	Yes
		EI	89.9	80.7	65.3	14.8	19.2	17.4	No	Yes
LD #2	Corbin	Homog Precinct	82.7	***	55.0	9.4	***	17.5	No	***
		Simple Regr	82.8	91.9	50.7	15.0	11.7	7.6	No	Yes
		Double Regr	80.5	93.4	46.7	15.0	11.7	7.6	Yes	Yes
		EI	81.9	44.2	52.0	17.7	28.4	26.5	No	No
LD #3	Mirza	Homog Precinct	***	***	26.5	***	***	27.0	***	***
		Simple Regr	87.5	25.0	20.5	18.0	***	29.0	Yes	No
		Double Regr	91.9	***	22.6	18.0	***	29.0	Yes	***
		EI	83.9	78.7	17.3	***	***	***	Yes	Yes
LD #7	Toback	Homog Precinct	***	***	55.8	***	***	19.3	***	***
		Simple Regr	97.7	***	59.0	15.7	1.8	20.0	No	***
		Double Regr	104.0	***	58.0	15.7	1.8	20.0	No	***
		EI	48.4	21.8	55.9	12.7	***	19.3	No	No

*** No estimate is possible or no reliably plausible estimate was produced.

Table 6: Results of Racially Polarized Voting and Turnout Analysis in Four Legislative Districts: 2005

Dist #	Black Voters' Candidate of Choice	Method of Analysis	Black Vote%	Hspn Vote%	White Vote%	Black TO%	Hspn TO%	White TO%	Racially Polarized Voting	Black & Hispanic Coalition
LD #1	Abrahams	Homog Precinct	91.2	***	***	26.8	***	***	***	***
		Simple Regr	94.1	76.5	52.5	25.7	10.2	33.0	No	Yes
		Double Regr	95.8	62.1	60.5	25.9	10.0	31.9	No	Yes
		EI	94.7	64.4	50.5	25.2	22.9	34.5	No	Yes
LD #2	Corbin	Homog Precinct	84.7	***	41.7	16.7	***	26.3	Yes	***
		Simple Regr	89.7	78.7	50.6	26.0	3.9	11.6	No	Yes
		Double Regr	87.0	73.1	45.6	26.3	18.9	11.5	Yes	Yes
		EI	89.9	66.6	53.2	22.5	***	***	No	Yes
LD #3	Mirza	Homog Precinct	***	***	30.8	***	***	35.9	***	***
		Simple Regr	85.9	44.4	25.5	24.2	***	37.8	Yes	No
		Double Regr	89.3	20.5	27.6	24.3	***	37.9	Yes	No
		EI	85.3	***	22.8	21.2	***	32.8	Yes	***
LD #7	Toback	Homog Precinct	***	***	56.2	***	***	33.2	***	***
		Simple Regr	96.3	***	57.9	24.6	***	34.5	No	***
		Double Regr	102.1	***	57.2	24.1	***	34.6	No	***
		EI	56.6	38.7	54.7	14.2	16.8	33.4	No	No

*** No estimate is possible or no reliably plausible estimate was produced.

Table 7: Results of Racially Polarized Voting and Turnout Analysis in Four Legislative Districts: 2003

Dist #	Black Voters' Candidate of Choice	Method of Analysis	Black Vote%	Hspn Vote%	White Vote%	Black TO%	Hspn TO%	White TO%	Racially Polarized Voting	Black & Hispanic Coalition
LD #1	Abrahams	Homog Precinct	92.7	***	***	18.8	***	***	***	***
		Simple Regr	96.3	77.1	43.4	19.1	2.9	22.7	Yes	Yes
		Double Regr	95.7	30.9	51.6	19.3	3.1	22.8	No	No
		EI	95.5	70.7	43.2	16.6	17.1	23.9	Yes	Yes
LD #2	Corbin	Homog Precinct	79.8	***	41.4	11.2	***	21.9	Yes	***
		Simple Regr	92.0	70.2	43.5	22.2	4.0	10.5	Yes	Yes
		Double Regr	90.8	***	42.6	21.9	3.6	10.5	Yes	Yes
		EI	88.1	46.1	43.8	17.0	36.6	28.1	Yes	Yes
LD #3	DeAngelis	Homog Precinct	***	***	33.4	***	***	30.8	***	***
		Simple Regr	82.3	12.5	28.8	16.9	***	32.4	Yes	Yes
		Double Regr	91.8	***	30.0	16.9	***	32.4	Yes	Yes
		EI	80.6	***	23.1	***	***	28.5	Yes	Yes
LD #7	Toback	Homog Precinct	***	***	62.3	***	***	21.7	***	***
		Simple Regr	87.2	***	65.1	16.7	7.3	22.3	No	No
		Double Regr	98.3	***	64.2	16.3	***	22.4	No	No
		EI	47.0	35.2	61.6	15.1	2.5	21.8	No	No

*** No estimate is possible or no reliably plausible estimate was produced.

Table 8: Results of Racially Polarized Voting and Turnout Analysis in County Executive Elections within LD3 & LD7

County Executive

Year	Black Voters' Candidate of Choice	LD	Method of Analysis	Black Vote%	White Vote%		Black TO%	White TO%	Racially Polarized Voting
2009	Suozzi	3	Homog Precinct	***	36.6		***	31.0	***
		3	Simple Regr	108.2	29.8		15.7	26.4	Yes
		3	Double Regr	~~~	~~~		~~~	~~~	~~~
		3	EI	93.7	27.2		17.0	28.1	Yes
		7	Homog Precinct	***	51.4		***	26.9	***
		7	Simple Regr	62.6	51.7		***	26.2	No
		7	Double Regr	~~~	~~~		~~~	~~~	~~~
		7	EI	64.9	51.6		4.0	27.0	No
2005	Suozzi	3	Homog Precinct	***	46.0		***	36.6	***
		3	Simple Regr	95.7	41.8		18.4	32.3	Yes
		3	Double Regr	~~~	~~~		~~~	~~~	~~~
		3	EI	98.7	36.4		21.5	33.6	Yes
		7	Homog Precinct	***	65.6		***	33.3	***
		7	Simple Regr	64.1	49.8		8.9	32.9	Yes
		7	Double Regr	~~~	~~~		~~~	~~~	~~~
		7	EI	51.4	57.8		18.4	33.5	No

*** No estimate is possible or no reliably plausible estimate was produced.

~~~ Double regression estimates are implausibly exaggerated.



Table 9: Results of Racially Polarized Voting and Turnout Analysis in County DA Elections within LD3 & LD7

### County District Attorney

| Year | Black Voters' Candidate of Choice | LD | Method of Analysis | Black Vote% | White Vote% |  | Black TO% | White TO% | Racially Polarized Voting |
|------|-----------------------------------|----|--------------------|-------------|-------------|--|-----------|-----------|---------------------------|
| 2009 | Rice                              | 3  | Homog Precinct     | ***         | 43.2        |  | ***       | 29.3      | ***                       |
|      |                                   | 3  | Simple Regr        | 107.3       | 36.3        |  | 14.1      | 24.8      | Yes                       |
|      |                                   | 3  | Double Regr        | ~~~         | ~~~         |  | ~~~       | ~~~       | ~~~                       |
|      |                                   | 3  | EI                 | 97.8        | 37.8        |  | 15.2      | 26.5      | Yes                       |
|      |                                   |    |                    |             |             |  |           |           |                           |
|      |                                   | 7  | Homog Precinct     | ***         | 54.8        |  | ***       | 25.6      | ***                       |
|      |                                   | 7  | Simple Regr        | 61.9        | 54.8        |  | 17.6      | 26.1      | No                        |
|      |                                   | 7  | Double Regr        | ~~~         | ~~~         |  | ~~~       | ~~~       | ~~~                       |
|      |                                   | 7  | EI                 | 63.4        | 55.2        |  | 3.0       | 25.9      | No                        |
|      |                                   |    |                    |             |             |  |           |           |                           |
| 2005 | Rice                              | 3  | Homog Precinct     | ***         | 39.9        |  | ***       | 36.2      | ***                       |
|      |                                   | 3  | Simple Regr        | 94.9        | 35.3        |  | 17.5      | 31.8      | Yes                       |
|      |                                   | 3  | Double Regr        | ~~~         | ~~~         |  | ~~~       | ~~~       | ~~~                       |
|      |                                   | 3  | EI                 | 97.9        | 29.3        |  | 19.9      | 33.1      | Yes                       |
|      |                                   |    |                    |             |             |  |           |           |                           |
|      |                                   | 7  | Homog Precinct     | ***         | 54.6        |  | ***       | 32.6      | ***                       |
|      |                                   | 7  | Simple Regr        | 56.4        | 53.4        |  | 7.6       | 32.3      | No                        |
|      |                                   | 7  | Double Regr        | ~~~         | ~~~         |  | ~~~       | ~~~       | ~~~                       |
|      |                                   | 7  | EI                 | 55.1        | 53.7        |  | xxx       | 32.8      | No                        |
|      |                                   |    |                    |             |             |  |           |           |                           |

\*\*\* No estimate is possible or no reliably plausible estimate was produced.

~~~ Double regression estimates are implausibly exaggerated.

Table 10: Results of Racially Polarized Voting and Turnout Analysis in County Comptroller Elections within LD3 & LD7

County Comptroller

| Year | Black Voters' Candidate of Choice | LD | Method of Analysis | Black Vote% | White Vote% | | Black TO% | White TO% | Racially Polarized Voting |
|------|-----------------------------------|----|--------------------|-------------|-------------|--|-----------|-----------|---------------------------|
| 2009 | Weitzman | 3 | Homog Precinct | *** | 37.3 | | *** | 29.1 | *** |
| | | 3 | Simple Regr | 110.5 | 29.7 | | 13.4 | 24.7 | Yes |
| | | 3 | Double Regr | ~~~ | ~~~ | | ~~~ | ~~~ | ~~~ |
| | | 3 | EI | 95.4 | 28.4 | | 14.8 | 26.2 | Yes |
| | | | | | | | | | |
| | | 7 | Homog Precinct | *** | 55.6 | | *** | 25.6 | *** |
| | | 7 | Simple Regr | 50.9 | 55.4 | | *** | 24.8 | No |
| | | 7 | Double Regr | ~~~ | ~~~ | | ~~~ | ~~~ | ~~~ |
| | | 7 | EI | 57.8 | 55.2 | | 2.3 | 25.8 | No |
| | | | | | | | | | |
| 2005 | Weitzman | 3 | Homog Precinct | *** | 38.9 | | *** | 35.6 | *** |
| | | 3 | Simple Regr | 92.7 | 34.6 | | 17.0 | 31.4 | Yes |
| | | 3 | Double Regr | ~~~ | ~~~ | | ~~~ | ~~~ | ~~~ |
| | | 3 | EI | 91.4 | 28.3 | | *** | 32.9 | Yes |
| | | | | | | | | | |
| | | 7 | Homog Precinct | *** | 66.4 | | *** | 32.6 | *** |
| | | 7 | Simple Regr | 48.4 | 58.8 | | 5.8 | 32.2 | No |
| | | 7 | Double Regr | ~~~ | ~~~ | | ~~~ | ~~~ | ~~~ |
| | | 7 | EI | 51.8 | 59.1 | | 15.2 | 34.9 | No |
| | | | | | | | | | |

*** No estimate is possible or no reliably plausible estimate was produced.

~~~ Double regression estimates are implausibly exaggerated.

Table 11: Results of Racially Polarized Voting and Turnout Analysis in County Clerk Elections within LD3 & LD7

### County Clerk

| Year | Black Voters' Candidate of Choice | LD | Method of Analysis | Black Vote% | White Vote% |  | Black TO% | White TO% | Racially Polarized Voting |
|------|-----------------------------------|----|--------------------|-------------|-------------|--|-----------|-----------|---------------------------|
| 2009 | Solages                           | 3  | Homog Precinct     | ***         | 26.2        |  | ***       | 28.3      | ***                       |
|      |                                   | 3  | Simple Regr        | 109.1       | 20.2        |  | 15.1      | 24.0      | Yes                       |
|      |                                   | 3  | Double Regr        | ~~~         | ~~~         |  | ~~~       | ~~~       | ~~~                       |
|      |                                   | 3  | EI                 | 89.8        | 18.0        |  | 16.4      | 25.4      | Yes                       |
|      |                                   |    |                    |             |             |  |           |           |                           |
|      |                                   | 7  | Homog Precinct     | ***         | 37.4        |  | ***       | 24.2      | ***                       |
|      |                                   | 7  | Simple Regr        | 68.2        | 37.2        |  | ***       | 23.6      | Yes                       |
|      |                                   | 7  | Double Regr        | ~~~         | ~~~         |  | ~~~       | ~~~       | ~~~                       |
|      |                                   | 7  | EI                 | 66.4        | 37.5        |  | 3.5       | 24.5      | Yes                       |
|      |                                   |    |                    |             |             |  |           |           |                           |
| 2005 | Ferrell                           | 3  | Homog Precinct     | ***         | 35.1        |  | ***       | 34.5      | ***                       |
|      |                                   | 3  | Simple Regr        | 95.9        | 31.7        |  | 17.1      | 30.3      | Yes                       |
|      |                                   | 3  | Double Regr        | ~~~         | ~~~         |  | ~~~       | ~~~       | ~~~                       |
|      |                                   | 3  | EI                 | 93.3        | 25.8        |  | ***       | 31.6      | Yes                       |
|      |                                   |    |                    |             |             |  |           |           |                           |
|      |                                   | 7  | Homog Precinct     | ***         | 53.9        |  | ***       | 30.6      | ***                       |
|      |                                   | 7  | Simple Regr        | 56.9        | 52.2        |  | 8.3       | 30.3      | No                        |
|      |                                   | 7  | Double Regr        | ~~~         | ~~~         |  | ~~~       | ~~~       | ~~~                       |
|      |                                   | 7  | EI                 | 68.2        | 52.4        |  | 16.3      | 30.7      | No                        |
|      |                                   |    |                    |             |             |  |           |           |                           |

\*\*\* No estimate is possible or no reliably plausible estimate was produced

~~~ Double regression estimates are implausibly exaggerated.

Table 12:

**VTDs from Current LDs 3, 5, & 7 Moved to Proposed LD 19, with
Proportions and Estimated Citizen Voting Age Population from Current LDs**

| VTDs
Current | Proportion
of | Estimated | VTDs
Current | Proportion
of | Estimated | VTDs
Current | Proportion
From | Estimated |
|-----------------|------------------|-----------|-----------------|------------------|-----------|-----------------|--------------------|-----------|
| LD 3 | VTD | CVAP | LD 5 | VTD | CVAP | LD 7 | VTD | CVAP |
| 46 | 1.00 | 1464 | 59 | .00 | 1 | 458 | 1.00 | 601 |
| 47 | .65 | 662 | 61 | .02 | 18 | 459 | 1.00 | 810 |
| 48 | .04 | 30 | | | | 460 | 1.00 | 566 |
| 49 | 1.00 | 1089 | | | | 461 | 1.00 | 463 |
| 50 | .84 | 1084 | | | | 462 | .83 | 867 |
| 147 | 1.00 | 1 | | | | 464 | .19 | 121 |
| 544 | .75 | 378 | | | | 465 | .92 | 1880 |
| 559 | .99 | 881 | | | | 467 | .04 | 63 |
| 563 | 1.00 | 641 | | | | 468 | 1.00 | 750 |
| 564 | 1.00 | 2647 | | | | 469 | 1.00 | 663 |
| 565 | 1.00 | 1514 | | | | 502 | .03 | 22 |
| 566 | 1.00 | 1022 | | | | 503 | .01 | 8 |
| 567 | 1.00 | 1538 | | | | 505 | .00 | 3 |
| 568 | .15 | 210 | | | | 507 | 1.00 | 829 |
| 571 | 1.00 | 2102 | | | | 513 | .97 | 1210 |
| 572 | .41 | 640 | | | | 514 | .98 | 1863 |
| 574 | 1.00 | 1014 | | | | 517 | 1.00 | 1033 |
| 575 | 1.00 | 1647 | | | | 518 | .76 | 384 |
| 576 | 1.00 | 832 | | | | 519 | 1.00 | 718 |
| 577 | 1.00 | 1148 | | | | 526 | 1.00 | 279 |
| 579 | .37 | 448 | | | | 527 | 1.00 | 926 |
| 580 | 1.00 | 1253 | | | | 528 | 1.00 | 648 |
| 581 | 1.00 | 819 | | | | 529 | .47 | 362 |
| 582 | .56 | 562 | | | | 530 | .76 | 255 |
| 583 | 1.00 | 1661 | | | | | | |
| 584 | .32 | 137 | | | | | | |
| 589 | 1.00 | 1301 | | | | | | |
| 631 | 1.00 | 1341 | | | | | | |
| 632 | 1.00 | 795 | | | | | | |
| 637 | 1.00 | 951 | | | | | | |
| 651 | 1.00 | 37 | | | | | | |
| Total | ~~~ | 29849 | ~~~ | ~~~ | 19 | ~~~ | ~~~ | 15326 |

Table 13:

**Projected Votes in Proposed LD19 from Combinations of Votes from Current LD7
& Four County-wide 2009 Elections with Votes from the 2009 Election in Current LD3**

| Election | Various Elections
from parts of cLD7 | | Ciotti v Bastardi
from cLD3 | | Projected
Combined Vote | |
|----------|---|------|--------------------------------|------|----------------------------|------|
| | Dem | Rep | Dem | Rep | Dem | Rep |
| cLD7 | 1647 | 1392 | ~~~~ | ~~~~ | 5009 | 4509 |
| cLD3 | ~~~~ | ~~~~ | 3362 | 3117 | | |
| Exec | 1784 | 1220 | ~~~~ | ~~~~ | 5146 | 4337 |
| cLD3 | ~~~~ | ~~~~ | 3362 | 3117 | | |
| DA | 1749 | 1182 | ~~~~ | ~~~~ | 5111 | 4299 |
| cLD3 | ~~~~ | ~~~~ | 3362 | 3117 | | |
| Comp | 1726 | 1552 | ~~~~ | ~~~~ | 5088 | 4269 |
| cLD3 | ~~~~ | ~~~~ | 3362 | 3117 | | |
| Clerk | 1236 | 1512 | ~~~~ | ~~~~ | 4598 | 4629 |
| cLD3 | ~~~~ | ~~~~ | 3362 | 3117 | | |

Table 14
(pages N&O for Democrats & P&Q for Republicans)

2009 Countywide Democratic Candidate Projected Vote Totals in Proposed LD 19

| Current
Dist # | VTD | CVAP
Blk% | CVAP
Hisp% | Executive
Dem Vote
Suozzi | DA
Dem Vote
Rice | Comp.
Dem Vote
Weitzman | Clerk
Dem Vote
Solages |
|-------------------|-------|--------------|---------------|---------------------------------|------------------------|-------------------------------|------------------------------|
| LD 3 | 46 | 36.46 | 21.75 | 169 | 155 | 150 | 125 |
| | 47 | 24.01 | 26.85 | 87 | 87 | 83 | 74 |
| | 48 | 25.42 | 15.16 | 5 | 6 | 5 | 4 |
| | 49 | 25.66 | 17.49 | 161 | 162 | 152 | 142 |
| | 50 | 37.21 | 6.16 | 134 | 131 | 125 | 120 |
| | 147 | 16.67 | 21.93 | 0 | 0 | 0 | 0 |
| | 544 | 10.45 | 28.36 | 60 | 65 | 61 | 52 |
| | 559 | 74.18 | 2.49 | 160 | 154 | 153 | 152 |
| | 563 | 60.36 | 9.24 | 109 | 97 | 101 | 97 |
| | 564 | 57.75 | 10.08 | 402 | 377 | 366 | 349 |
| | 565 | 45.08 | 11.40 | 211 | 202 | 191 | 178 |
| | 566 | 18.05 | 12.83 | 156 | 154 | 144 | 126 |
| | 567 | 34.54 | 19.84 | 168 | 171 | 154 | 136 |
| | 568 | 26.74 | 24.13 | 20 | 21 | 20 | 18 |
| | 571 | 47.86 | 11.67 | 360 | 362 | 338 | 336 |
| | 572 | 20.50 | 15.34 | 48 | 53 | 47 | 37 |
| | 574 | 71.76 | 6.55 | 218 | 199 | 199 | 190 |
| | 575 | 70.94 | 15.01 | 236 | 212 | 205 | 208 |
| | 576 | 60.66 | 7.05 | 169 | 159 | 160 | 165 |
| | 577 | 51.16 | 5.36 | 202 | 184 | 172 | 181 |
| | 579 | 28.71 | 6.20 | 35 | 39 | 35 | 30 |
| | 580 | 70.14 | 3.30 | 188 | 184 | 178 | 172 |
| | 581 | 43.16 | 14.26 | 140 | 127 | 127 | 131 |
| | 582 | 24.76 | 15.36 | 56 | 60 | 50 | 46 |
| | 583 | 31.20 | 6.67 | 230 | 237 | 208 | 173 |
| | 584 | 31.58 | 14.98 | 9 | 10 | 9 | 5 |
| | 589 | 51.49 | 17.53 | 203 | 182 | 183 | 189 |
| | 631 | 49.12 | 15.82 | 195 | 181 | 164 | 169 |
| | 632 | 41.98 | 14.47 | 88 | 92 | 74 | 80 |
| | 637 | 59.49 | 11.79 | 179 | 174 | 170 | 157 |
| | 651 | 22.79 | 45.59 | 0 | 0 | 0 | 0 |
| | Total | | | 4399 | 4238 | 4024 | 3844 |
| LD 6 | 59 | 1.34 | 22.17 | 0 | 0 | 0 | 0 |
| | 61 | .16 | 9.97 | 2 | 2 | 2 | 1 |
| | Total | | | 2 | 2 | 2 | 1 |
| LD 7 | 458 | 8.89 | .00 | 100 | 94 | 108 | 79 |
| | 459 | 11.50 | .00 | 97 | 89 | 97 | 75 |
| | 460 | 16.87 | .00 | 75 | 71 | 75 | 44 |
| | 461 | 2.09 | 2.27 | 102 | 107 | 104 | 81 |
| | 462 | 5.74 | 3.83 | 92 | 88 | 91 | 58 |

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| | | | | | | |
|-------|-------|-------|------|------|------|------|
| 464 | .00 | .00 | 21 | 21 | 24 | 12 |
| 465 | 2.19 | .16 | 289 | 270 | 281 | 160 |
| 467 | 2.01 | 5.62 | 7 | 7 | 7 | 4 |
| 468 | .51 | 3.51 | 138 | 129 | 141 | 79 |
| 469 | .58 | 4.24 | 135 | 128 | 131 | 77 |
| 502 | 1.56 | .00 | 4 | 4 | 4 | 2 |
| 503 | 3.96 | .00 | 1 | 1 | 1 | 0 |
| 505 | 8.13 | .00 | 0 | 0 | 0 | 0 |
| 507 | 35.34 | 18.81 | 71 | 74 | 60 | 51 |
| 513 | 7.47 | 24.90 | 76 | 81 | 67 | 50 |
| 514 | 25.80 | 31.64 | 93 | 89 | 82 | 74 |
| 517 | 8.19 | 20.37 | 48 | 57 | 40 | 30 |
| 518 | 50.46 | 27.47 | 28 | 26 | 25 | 24 |
| 519 | 68.47 | 26.24 | 67 | 57 | 52 | 50 |
| 526 | 17.65 | 1.53 | 15 | 22 | 15 | 11 |
| 527 | 13.80 | 7.53 | 108 | 112 | 107 | 95 |
| 528 | 12.42 | 16.01 | 112 | 110 | 110 | 96 |
| 529 | 13.49 | 12.85 | 57 | 59 | 53 | 45 |
| 530 | 7.06 | 11.76 | 49 | 52 | 51 | 39 |
| Total | | | 1784 | 1749 | 1726 | 1236 |

Table 14 (cont'd):

2009 Countywide Republican Candidate Projected Vote Totals in Proposed LD 19

| Current
Dist # | VTD | CVAP
Blk% | CVAP
Hisp% | Executive
Rep Vote
Mangano | DA
Rep Vote
Watson | Comp.
Rep Vote
Maragos | Clerk
Rep Vote
O'Connell |
|-------------------|-------|--------------|---------------|----------------------------------|--------------------------|------------------------------|--------------------------------|
| LD 3 | 46 | 36.46 | 21.75 | 75 | 85 | 83 | 109 |
| | 47 | 24.01 | 26.85 | 56 | 59 | 58 | 66 |
| | 48 | 25.42 | 15.16 | 4 | 4 | 5 | 5 |
| | 49 | 25.66 | 17.49 | 114 | 100 | 109 | 127 |
| | 50 | 37.21 | 6.16 | 73 | 66 | 66 | 77 |
| | 147 | 16.67 | 21.93 | 0 | 0 | 0 | 0 |
| | 544 | 10.45 | 28.36 | 40 | 37 | 39 | 47 |
| | 559 | 74.18 | 2.49 | 23 | 26 | 18 | 25 |
| | 563 | 60.36 | 9.24 | 17 | 11 | 13 | 17 |
| | 564 | 57.75 | 10.08 | 121 | 101 | 104 | 127 |
| | 565 | 45.08 | 11.40 | 80 | 69 | 72 | 89 |
| | 566 | 18.05 | 12.83 | 96 | 78 | 87 | 108 |
| | 567 | 34.54 | 19.84 | 126 | 118 | 122 | 147 |
| | 568 | 26.74 | 24.13 | 16 | 15 | 16 | 18 |
| | 571 | 47.86 | 11.67 | 153 | 139 | 136 | 161 |
| | 572 | 20.50 | 15.34 | 54 | 46 | 47 | 60 |
| | 574 | 71.76 | 6.55 | 29 | 29 | 31 | 43 |
| | 575 | 70.94 | 15.01 | 48 | 47 | 48 | 58 |
| | 576 | 60.66 | 7.05 | 42 | 35 | 32 | 41 |
| | 577 | 51.16 | 5.36 | 44 | 47 | 46 | 52 |
| | 579 | 28.71 | 6.20 | 47 | 41 | 46 | 50 |
| | 580 | 70.14 | 3.30 | 52 | 47 | 55 | 72 |
| | 581 | 43.16 | 14.26 | 58 | 63 | 54 | 67 |
| | 582 | 24.76 | 15.36 | 65 | 60 | 64 | 70 |
| | 583 | 31.20 | 6.67 | 142 | 141 | 152 | 184 |
| | 584 | 31.58 | 14.98 | 27 | 23 | 25 | 27 |
| | 589 | 51.49 | 17.53 | 61 | 67 | 66 | 69 |
| | 631 | 49.12 | 15.82 | 78 | 77 | 85 | 99 |
| | 632 | 41.98 | 14.47 | 77 | 75 | 83 | 83 |
| | 637 | 59.49 | 11.79 | 54 | 51 | 48 | 63 |
| | 651 | 22.79 | 45.59 | 0 | 0 | 0 | 0 |
| | Total | | | 1873 | 1756 | 1808 | 2161 |
| LD 6 | 59 | 1.34 | 22.17 | 0 | 0 | 0 | 0 |
| | 61 | .16 | 9.97 | 1 | 1 | 1 | 2 |
| | Total | | | 2 | 1 | 1 | 2 |
| LD 7 | 458 | 8.89 | .00 | 50 | 54 | 42 | 59 |
| | 459 | 11.50 | .00 | 50 | 54 | 44 | 64 |
| | 460 | 16.87 | .00 | 36 | 36 | 31 | 53 |
| | 461 | 2.09 | 2.27 | 36 | 35 | 32 | 54 |
| | 462 | 5.74 | 3.83 | 64 | 61 | 59 | 80 |
| | 464 | .00 | .00 | 16 | 15 | 13 | 20 |
| | 465 | 2.19 | .16 | 127 | 132 | 123 | 207 |
| | 467 | 2.01 | 5.62 | 6 | 5 | 5 | 7 |

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| | | | | | | |
|-------|-------|-------|------|------|------|------|
| 468 | .51 | 3.51 | 66 | 67 | 63 | 103 |
| 469 | .58 | 4.24 | 70 | 63 | 58 | 95 |
| 502 | 1.56 | .00 | 3 | 2 | 2 | 4 |
| 503 | 3.96 | .00 | 1 | 1 | 1 | 1 |
| 505 | 8.13 | .00 | 0 | 0 | 0 | 0 |
| 507 | 35.34 | 18.81 | 89 | 75 | 84 | 95 |
| 513 | 7.47 | 24.90 | 168 | 158 | 163 | 173 |
| 514 | 25.80 | 31.64 | 76 | 72 | 70 | 81 |
| 517 | 8.19 | 20.37 | 148 | 141 | 148 | 155 |
| 518 | 50.46 | 27.47 | 23 | 21 | 22 | 24 |
| 519 | 68.47 | 26.24 | 9 | 14 | 12 | 14 |
| 526 | 17.65 | 1.53 | 43 | 36 | 40 | 43 |
| 527 | 13.80 | 7.53 | 44 | 46 | 47 | 55 |
| 528 | 12.42 | 16.01 | 32 | 31 | 30 | 41 |
| 529 | 13.49 | 12.85 | 30 | 29 | 30 | 41 |
| 530 | 7.06 | 11.76 | 36 | 33 | 33 | 43 |
| Total | | | 1220 | 1182 | 1152 | 1512 |

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Table 15a: Comparisons of Projected Vote Totals from Parts of cLD7 between Solages and Four other Candidates

Democrat 2009

| VTD | cVAP% Black | cVAP% Hispn | cLD7 Toback | Exec Suozzi | DA Rice | Comp Weitzman | Clerk Solages |
|-------|-------------|-------------|-------------|-------------|---------|---------------|---------------|
| 458 | 8.89 | .00 | 93 | 100 | 94 | 108 | 79 |
| 459 | 11.50 | .00 | 86 | 97 | 89 | 97 | 75 |
| 460 | 16.87 | .00 | 69 | 75 | 71 | 75 | 44 |
| 461 | 2.09 | 2.27 | 89 | 102 | 107 | 104 | 81 |
| 462 | 5.74 | 3.83 | 85 | 92 | 88 | 91 | 58 |
| 464 | .00 | .00 | 18 | 21 | 21 | 24 | 12 |
| 465 | 2.19 | .16 | 270 | 289 | 270 | 281 | 160 |
| 467 | 2.01 | 5.62 | 7 | 7 | 7 | 7 | 4 |
| 468 | .51 | 3.51 | 134 | 138 | 129 | 141 | 79 |
| 469 | .58 | 4.24 | 123 | 135 | 128 | 131 | 77 |
| 502 | 1.56 | .00 | 4 | 4 | 4 | 4 | 2 |
| 503 | 3.96 | .00 | 1 | 1 | 1 | 1 | 0 |
| 505 | 8.13 | .00 | 0 | 0 | 0 | 0 | 0 |
| 507 | 35.34 | 18.81 | 63 | 71 | 74 | 60 | 51 |
| 513 | 7.47 | 24.90 | 65 | 76 | 81 | 67 | 50 |
| 514 | 25.80 | 31.64 | 87 | 93 | 89 | 82 | 74 |
| 517 | 8.19 | 20.37 | 45 | 48 | 57 | 40 | 30 |
| 518 | 50.46 | 27.47 | 26 | 28 | 26 | 25 | 24 |
| 519 | 68.47 | 26.24 | 58 | 67 | 57 | 52 | 50 |
| 526 | 17.65 | 1.53 | 22 | 15 | 22 | 15 | 11 |
| 527 | 13.80 | 7.53 | 97 | 108 | 112 | 107 | 95 |
| 528 | 12.42 | 16.01 | 109 | 112 | 110 | 110 | 96 |
| 529 | 13.49 | 12.85 | 51 | 57 | 59 | 53 | 45 |
| 530 | 7.06 | 11.76 | 44 | 49 | 52 | 51 | 39 |
| Total | | | 1647 | 1784 | 1749 | 1726 | 1236 |

Table 15b: Projected Republican Vote Totals from Parts of cLD7

Republican 2009

| VTD | cVAP% Black | cVAP% Hispn | cLD7 Tummi | Exec Mangano | DA Watson | Comp Marago | Clerk O'Connell |
|-------|-------------|-------------|------------|--------------|-----------|-------------|-----------------|
| 458 | 8.89 | .00 | 55 | 50 | 54 | 42 | 59 |
| 459 | 11.50 | .00 | 61 | 50 | 54 | 44 | 64 |
| 460 | 16.87 | .00 | 44 | 36 | 36 | 31 | 53 |
| 461 | 2.09 | 2.27 | 52 | 36 | 35 | 32 | 54 |
| 462 | 5.74 | 3.83 | 69 | 64 | 61 | 59 | 80 |
| 464 | .00 | .00 | 19 | 16 | 15 | 13 | 20 |
| 465 | 2.19 | .16 | 169 | 127 | 132 | 123 | 207 |
| 467 | 2.01 | 5.62 | 7 | 6 | 5 | 5 | 7 |
| 468 | .51 | 3.51 | 80 | 66 | 67 | 63 | 103 |
| 469 | .58 | 4.24 | 88 | 70 | 63 | 58 | 95 |
| 502 | 1.56 | .00 | 3 | 3 | 2 | 2 | 4 |
| 503 | 3.96 | .00 | 1 | 1 | 1 | 1 | 1 |
| 505 | 8.13 | .00 | 0 | 0 | 0 | 0 | 0 |
| 507 | 35.34 | 18.81 | 95 | 89 | 75 | 84 | 95 |
| 513 | 7.47 | 24.90 | 173 | 168 | 158 | 163 | 173 |
| 514 | 25.80 | 31.64 | 74 | 76 | 72 | 70 | 81 |
| 517 | 8.19 | 20.37 | 154 | 148 | 141 | 148 | 155 |
| 518 | 50.46 | 27.47 | 21 | 23 | 21 | 22 | 24 |
| 519 | 68.47 | 26.24 | 19 | 9 | 14 | 12 | 14 |
| 526 | 17.65 | 1.53 | 39 | 43 | 36 | 40 | 43 |
| 527 | 13.80 | 7.53 | 59 | 44 | 46 | 47 | 55 |
| 528 | 12.42 | 16.01 | 32 | 32 | 31 | 30 | 41 |
| 529 | 13.49 | 12.85 | 34 | 30 | 29 | 30 | 41 |
| 530 | 7.06 | 11.76 | 43 | 36 | 33 | 33 | 43 |
| Total | | | 1392 | 1220 | 1182 | 1152 | 1512 |

Table 16: Comparisons of Projected Vote Totals from parts of cLD7 between Farrell and Three Other Candidates

Democrats, 2005 Countywide Office Elections

| VTD | cVAP% Black | cVAP% Hispn | Exec Suozzi | DA Rice | Comp Weitzman | Clerk Ferrell |
|-------|-------------|-------------|-------------|---------|---------------|---------------|
| 458 | 8.89 | .00 | 195 | 159 | 183 | 157 |
| 459 | 11.50 | .00 | 165 | 142 | 155 | 128 |
| 460 | 16.87 | .00 | 131 | 101 | 116 | 101 |
| 461 | 2.09 | 2.27 | 145 | 112 | 128 | 112 |
| 462 | 5.74 | 3.83 | 159 | 135 | 147 | 125 |
| 464 | .00 | .00 | 32 | 24 | 30 | 22 |
| 465 | 2.19 | .16 | 463 | 351 | 420 | 324 |
| 467 | 2.01 | 5.62 | 13 | 10 | 12 | 9 |
| 468 | .51 | 3.51 | 227 | 174 | 204 | 161 |
| 469 | .58 | 4.24 | 222 | 154 | 189 | 152 |
| 502 | 1.56 | .00 | 5 | 5 | 5 | 4 |
| 503 | 3.96 | .00 | 2 | 1 | 1 | 1 |
| 505 | 8.13 | .00 | 1 | 0 | 1 | 0 |
| 507 | 35.34 | 18.81 | 110 | 97 | 84 | 84 |
| 513 | 7.47 | 24.90 | 124 | 113 | 99 | 92 |
| 514 | 25.80 | 31.64 | 140 | 144 | 131 | 135 |
| 517 | 8.19 | 20.37 | 79 | 63 | 61 | 54 |
| 518 | 50.46 | 27.47 | 48 | 44 | 40 | 38 |
| 519 | 68.47 | 26.24 | 123 | 111 | 110 | 110 |
| 526 | 17.65 | 1.53 | 14 | 19 | 13 | 14 |
| 527 | 13.80 | 7.53 | 163 | 142 | 150 | 137 |
| 528 | 12.42 | 16.01 | 161 | 140 | 146 | 140 |
| 529 | 13.49 | 12.85 | 86 | 75 | 78 | 71 |
| 530 | 7.06 | 11.76 | 84 | 73 | 76 | 68 |
| Total | | | 2891 | 2389 | 2579 | 2241 |

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Table 17:
(pages T&U for Democrats & V&W for Republicans)

2005 Countywide Democratic Candidate Projected Vote Totals in Proposed LD 19

| Current
Dist # | | CVAP | CVAP | | Executive
Dem Vote | DA
Dem Vote | Comp.
Dem Vote | Clerk
Dem Vote |
|-------------------|-------|-------|-------|--|-----------------------|----------------|-------------------|-------------------|
| | VTD | Blk% | Hisp% | | Suozzi | Rice | Weitzman | Ferrell |
| LD 3 | 46 | 36.46 | 21.75 | | 182 | 155 | 150 | 142 |
| | 47 | 24.01 | 26.85 | | 101 | 90 | 92 | 88 |
| | 48 | 25.42 | 15.16 | | 6 | 5 | 5 | 5 |
| | 49 | 25.66 | 17.49 | | 170 | 153 | 146 | 138 |
| | 50 | 37.21 | 6.16 | | 139 | 113 | 115 | 111 |
| | 147 | 16.67 | 21.93 | | 0 | 0 | 0 | 0 |
| | 544 | 10.45 | 28.36 | | 79 | 76 | 72 | 71 |
| | 559 | 74.18 | 2.49 | | 184 | 179 | 162 | 169 |
| | 563 | 60.36 | 9.24 | | 128 | 122 | 112 | 116 |
| | 564 | 57.75 | 10.08 | | 489 | 450 | 443 | 441 |
| | 565 | 45.08 | 11.40 | | 226 | 220 | 206 | 212 |
| | 566 | 18.05 | 12.83 | | 172 | 160 | 162 | 148 |
| | 567 | 34.54 | 19.84 | | 184 | 162 | 153 | 166 |
| | 568 | 26.74 | 24.13 | | 28 | 24 | 23 | 23 |
| | 571 | 47.86 | 11.67 | | 399 | 382 | 369 | 347 |
| | 572 | 20.50 | 15.34 | | 77 | 63 | 68 | 63 |
| | 574 | 71.76 | 6.55 | | 224 | 205 | 197 | 196 |
| | 575 | 70.94 | 15.01 | | 267 | 251 | 242 | 247 |
| | 576 | 60.66 | 7.05 | | 186 | 186 | 166 | 163 |
| | 577 | 51.16 | 5.36 | | 222 | 211 | 202 | 197 |
| | 579 | 28.71 | 6.20 | | 47 | 39 | 41 | 39 |
| | 580 | 70.14 | 3.30 | | 257 | 229 | 222 | 220 |
| | 581 | 43.16 | 14.26 | | 167 | 150 | 146 | 144 |
| | 582 | 24.76 | 15.36 | | 70 | 67 | 62 | 59 |
| | 583 | 31.20 | 6.67 | | 275 | 227 | 225 | 212 |
| | 584 | 31.58 | 14.98 | | 15 | 13 | 12 | 11 |
| | 589 | 51.49 | 17.53 | | 225 | 204 | 206 | 197 |
| | 631 | 49.12 | 15.82 | | 225 | 190 | 186 | 188 |
| | 632 | 41.98 | 14.47 | | 112 | 116 | 106 | 104 |
| | 637 | 59.49 | 11.79 | | 244 | 245 | 224 | 221 |
| | 651 | 22.79 | 45.59 | | 0 | 0 | 0 | 0 |
| | Total | | | | 5101 | 4687 | 4515 | 4437 |
| LD 6 | 59 | 1.34 | 22.17 | | 0 | 0 | 0 | 0 |
| | 61 | .16 | 9.97 | | 4 | 3 | 3 | 3 |
| | Total | | | | 4 | 3 | 3 | 3 |
| LD 7 | 458 | 8.89 | .00 | | 195 | 159 | 183 | 157 |
| | 459 | 11.50 | .00 | | 165 | 142 | 155 | 128 |
| | 460 | 16.87 | .00 | | 131 | 101 | 116 | 101 |
| | 461 | 2.09 | 2.27 | | 145 | 112 | 128 | 112 |
| | 462 | 5.74 | 3.83 | | 159 | 135 | 147 | 125 |
| | 464 | .00 | .00 | | 32 | 24 | 30 | 22 |

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|-------|-------|-------|------|------|------|------|
| 465 | 2.19 | .16 | 463 | 351 | 420 | 324 |
| 467 | 2.01 | 5.62 | 13 | 10 | 12 | 9 |
| 468 | .51 | 3.51 | 227 | 174 | 204 | 161 |
| 469 | .58 | 4.24 | 222 | 154 | 189 | 152 |
| 502 | 1.56 | .00 | 5 | 5 | 5 | 4 |
| 503 | 3.96 | .00 | 2 | 1 | 1 | 1 |
| 505 | 8.13 | .00 | 1 | 0 | 1 | 0 |
| 507 | 35.34 | 18.81 | 110 | 97 | 84 | 84 |
| 513 | 7.47 | 24.90 | 124 | 113 | 99 | 92 |
| 514 | 25.80 | 31.64 | 140 | 144 | 131 | 135 |
| 517 | 8.19 | 20.37 | 79 | 63 | 61 | 54 |
| 518 | 50.46 | 27.47 | 48 | 44 | 40 | 38 |
| 519 | 68.47 | 26.24 | 123 | 111 | 110 | 110 |
| 526 | 17.65 | 1.53 | 14 | 19 | 13 | 14 |
| 527 | 13.80 | 7.53 | 163 | 142 | 150 | 137 |
| 528 | 12.42 | 16.01 | 161 | 140 | 146 | 140 |
| 529 | 13.49 | 12.85 | 86 | 75 | 78 | 71 |
| 530 | 7.06 | 11.76 | 84 | 73 | 76 | 68 |
| Total | | | 2891 | 2389 | 2579 | 2241 |

Table 17 (cont'd):

2005 Countywide Republican Candidate Projected Vote Totals in Proposed LD 19

| Current
Dist # | VTD | CVAP
Blk% | CVAP
Hisp% | Executive
Rep Vote
Peters | DA
Rep Vote
Dillon | Comp.
Rep Vote
Clavin | Clerk
Rep Vote
O'Connell |
|-------------------|-------|--------------|---------------|---------------------------------|--------------------------|-----------------------------|--------------------------------|
| LD 3 | 46 | 36.46 | 21.75 | 110 | 135 | 140 | 131 |
| | 47 | 24.01 | 26.85 | 63 | 71 | 68 | 66 |
| | 48 | 25.42 | 15.16 | 4 | 5 | 6 | 5 |
| | 49 | 25.66 | 17.49 | 95 | 113 | 114 | 117 |
| | 50 | 37.21 | 6.16 | 75 | 94 | 91 | 89 |
| | 147 | 16.67 | 21.93 | 0 | 0 | 0 | 0 |
| | 544 | 10.45 | 28.36 | 45 | 49 | 50 | 50 |
| | 559 | 74.18 | 2.49 | 23 | 26 | 37 | 31 |
| | 563 | 60.36 | 9.24 | 18 | 26 | 26 | 24 |
| | 564 | 57.75 | 10.08 | 133 | 156 | 148 | 147 |
| | 565 | 45.08 | 11.40 | 144 | 143 | 150 | 153 |
| | 566 | 18.05 | 12.83 | 83 | 89 | 85 | 94 |
| | 567 | 34.54 | 19.84 | 123 | 137 | 143 | 132 |
| | 568 | 26.74 | 24.13 | 18 | 21 | 21 | 20 |
| | 571 | 47.86 | 11.67 | 178 | 192 | 201 | 201 |
| | 572 | 20.50 | 15.34 | 65 | 76 | 68 | 68 |
| | 574 | 71.76 | 6.55 | 62 | 76 | 80 | 78 |
| | 575 | 70.94 | 15.01 | 62 | 75 | 73 | 70 |
| | 576 | 60.66 | 7.05 | 53 | 55 | 65 | 66 |
| | 577 | 51.16 | 5.36 | 45 | 61 | 67 | 67 |
| | 579 | 28.71 | 6.20 | 59 | 64 | 60 | 60 |
| | 580 | 70.14 | 3.30 | 68 | 87 | 90 | 94 |
| | 581 | 43.16 | 14.26 | 73 | 86 | 87 | 82 |
| | 582 | 24.76 | 15.36 | 77 | 86 | 89 | 91 |
| | 583 | 31.20 | 6.67 | 180 | 223 | 219 | 218 |
| | 584 | 31.58 | 14.98 | 27 | 29 | 31 | 28 |
| | 589 | 51.49 | 17.53 | 75 | 96 | 94 | 91 |
| | 631 | 49.12 | 15.82 | 111 | 129 | 135 | 126 |
| | 632 | 41.98 | 14.47 | 137 | 137 | 150 | 150 |
| | 637 | 59.49 | 11.79 | 62 | 73 | 76 | 77 |
| | 651 | 22.79 | 45.59 | 0 | 0 | 0 | 0 |
| | Total | | | 2268 | 2610 | 2663 | 2626 |
| LD 6 | 59 | 1.34 | 22.17 | 0 | 0 | 0 | 0 |
| | 61 | .16 | 9.97 | 1 | 2 | 2 | 2 |
| | Total | | | 1 | 2 | 2 | 2 |
| LD 7 | 458 | 8.89 | .00 | 43 | 73 | 52 | 74 |
| | 459 | 11.50 | .00 | 41 | 56 | 48 | 58 |
| | 460 | 16.87 | .00 | 29 | 54 | 40 | 46 |
| | 461 | 2.09 | 2.27 | 41 | 66 | 52 | 60 |
| | 462 | 5.74 | 3.83 | 61 | 80 | 76 | 81 |
| | 464 | .00 | .00 | 11 | 18 | 13 | 16 |
| | 465 | 2.19 | .16 | 151 | 247 | 191 | 236 |

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|-------|-------|-------|------|------|------|------|
| 467 | 2.01 | 5.62 | 5 | 8 | 6 | 8 |
| 468 | .51 | 3.51 | 87 | 131 | 102 | 119 |
| 469 | .58 | 4.24 | 72 | 122 | 92 | 95 |
| 502 | 1.56 | .00 | 2 | 3 | 3 | 3 |
| 503 | 3.96 | .00 | 1 | 1 | 1 | 1 |
| 505 | 8.13 | .00 | 0 | 0 | 0 | 0 |
| 507 | 35.34 | 18.81 | 115 | 129 | 133 | 131 |
| 513 | 7.47 | 24.90 | 207 | 219 | 228 | 224 |
| 514 | 25.80 | 31.64 | 107 | 103 | 105 | 102 |
| 517 | 8.19 | 20.37 | 184 | 190 | 193 | 199 |
| 518 | 50.46 | 27.47 | 62 | 66 | 65 | 65 |
| 519 | 68.47 | 26.24 | 28 | 35 | 26 | 29 |
| 526 | 17.65 | 1.53 | 43 | 38 | 44 | 44 |
| 527 | 13.80 | 7.53 | 38 | 57 | 47 | 48 |
| 528 | 12.42 | 16.01 | 33 | 55 | 48 | 48 |
| 529 | 13.49 | 12.85 | 27 | 35 | 33 | 33 |
| 530 | 7.06 | 11.76 | 36 | 46 | 45 | 46 |
| Total | | | 1424 | 1833 | 1643 | 1765 |

Table 18:

**Projections for Electing a Black Candidate in Three Majority-Minority Districts,
Based on a Districting Plan Drawn by Andrew Beveridge**

| Beveridge District | Projected Vote for Solages | Projected Vote for O'Connell | Solages Projected District Vote% |
|--------------------|----------------------------|------------------------------|----------------------------------|
| #1 | 5978 | 2515 | 70.4 |
| #2 | 4919 | 1650 | 74.9 |
| #3 | 5861 | 3351 | 63.6 |